

Central Valley Regional Water Quality Control Board

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Peter Miljanich
Shute, Mihaly & Weinberger LLP
396 Hayes St.
San Francisco, CA 94102

RESPONSE TO COMMENTS REGARDING WASTE DISCHARGE REQUIREMENTS FOR FORWARD LANDFILL, SAN JOAQUIN COUNTY

Central Valley Water Board staff has reviewed your comments of 23 December 2013 concerning the Tentative Waste Discharge Requirements for Forward Landfill. Staff has the following responses to your comments. We have paraphrased Clean San Joaquin's comments preceding each of our responses. A copy of the comment letter is enclosed.

Comment A: Solar Drying

Drying is necessary to prevent anaerobic decomposition of the waste which is a primary source of odors; complete drying within five days interrupts insect lifecycles; and drying limits waste accessibility to vectors.

Response: The following has been added to the Discharge Specifications Section of the proposed Order:

1. The Discharger shall implement the following BMPs for cannery waste:
 - a. The ground surface shall be prepared prior to the application of waste.
 - b. Waste shall be spread thinly, no more than 3 inches deep, to ensure complete drying within five days.
 - c. Waste shall be turned twice daily with a cultivating device to facilitate drying.

Comment B: Setbacks from Water Sources

Setbacks should be established to protect water bodies and water wells.

Response: The following has been added to the Facility Specifications Section of the proposed Order:

1. The Discharger shall maintain a 50-foot setback between land application areas and all natural occurring water bodies.
2. Land application areas shall be at least 1,000 feet from a domestic water supply well.

Comment C: Daily Records of Waste Disposal, Location, and Unusual Occurrences, and Removal of Extraneous Material from Applied Cannery Waste

The Discharger should be required to keep daily records of all waste disposed at the facility; location of disposal areas; and unusual occurrences. Also, the Discharger should remove any extraneous material from applied cannery waste.

Response: The following changes have been made to the Discharge Specifications:

1. The Discharger shall discharge only Cannery Wastes as described in Findings 30, and 80 through 84 of this Order at the land application area shown on Attachment B. Extraneous material shall be removed from applied cannery waste.
2. The Discharger shall daily record cannery waste loads received, locations of disposal and any unusual occurrences.

Comment D: Proper Sampling and Monitoring

The Central Valley Water Board should require the Discharger to sample soil in the application area prior to and after application.

Response: Section A.8 of the Monitoring and Reporting Program has been revised to read: "The Discharger shall collect representative soil samples from the land application areas at the beginning and end of each cannery season; and daily wet weight and weekly composite waste samples from each cannery waste source. Less frequent composite sampling may be permitted if justified and approved by Water Board staff. The soil and composite waste samples shall be analyzed for biochemical oxygen demand (BOD), total dissolved solids, and total nitrogen. In addition, the weekly total mass of nitrogen applied per acre shall be calculated and reported in the Quarterly Reports. At the end of the cannery season, the total mass of nitrogen per acre must be determined and a crop that will uptake 100% of the nitrogen must be planted, grown and harvested before the next cannery season. An annual land application monitoring summary shall be reported in the Annual Report."

Comment III: Disposal of Cannery Rinse Water at the Compost Facility Should be Prohibited

The Central Valley Water Board should postpone any approval of cannery rinsate disposal to the compost facility until the Landfill has undertaken a detailed investigation of the cannery rinsate's contribution to the odor, vector, and water degradation problems.

Response: The following Discharge Specification has been added to the proposed Order:

"Cannery rinsate may be discharged to the compost facility when the Discharger demonstrates to the satisfaction of Water Board staff that cannery rinsate does not cause nuisance odors or attract vectors."

Thank you for your comments, they have resulted in more protective Waste Discharge Requirements. If you have any questions, please call me at (916) 464-4614 or via email at ratkinson@waterboards.cs.gov.

Ross D. Atkinson
Engineering Geologist
Title 27 Permitting and Mines Unit

Enclosure: Clean San Joaquin Comment Letter

cc on following page

cc: Robert McClellan, San Joaquin County LEA, Stockton.
Erin Fanning, Forward Inc., Manteca
Don Litchfield, Forward Inc., Manteca

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